

REQUEST FOR ADMISSION NO. 99:

Admit that the Orito reference discloses a method of manufacturing active matrix display backplanes.

REQUEST FOR ADMISSION NO. 100:

Admit that the Orito reference discloses a method of manufacturing active matrix displays.

REQUEST FOR ADMISSION NO. 101:

Admit that the Orito reference discloses an insulating substrate.

REQUEST FOR ADMISSION NO. 102:

Admit that the Orito reference discloses forming a pattern of pixels on a substrate.

REQUEST FOR ADMISSION NO. 103:

Admit that the Orito reference discloses forming a plurality of row pixel activation lines.

REQUEST FOR ADMISSION NO. 104:

Admit that the Orito reference discloses forming a plurality of column pixel activation lines.

REQUEST FOR ADMISSION NO. 105:

Admit that the Orito reference discloses forming a plurality of row and column intersecting pixel activation lines.

REQUEST FOR ADMISSION NO. 106:

Admit that the Orito reference discloses forming an inner electrostatic discharge guard ring on a substrate.

REQUEST FOR ADMISSION NO. 107:

Admit that the Orito reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines.

REQUEST FOR ADMISSION NO. 108:

Admit that the Orito reference discloses shunt switching elements.

REQUEST FOR ADMISSION NO. 109:

Admit that the Orito reference discloses protective transistors.

REQUEST FOR ADMISSION NO. 110:

Admit that the protective transistors disclosed in the Orito reference are shunt switching elements.

REQUEST FOR ADMISSION NO. 111:

Admit that the Orito reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via shunt switching elements.

REQUEST FOR ADMISSION NO. 112:

Admit that the Orito reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via protective transistors.

REQUEST FOR ADMISSION NO. 113:

Admit that the Orito reference discloses providing protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 114:

Admit that the Orito reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via shunt switching elements to provide protection from electrostatic discharges between said row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 115:

Admit that the Orito reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via protective transistors to provide protection from electrostatic discharges between said row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 116:

Admit that the Orito reference discloses every step of the method of claim 10 of the '002 patent.

REQUEST FOR ADMISSION NO. 117:

Admit that the Yudasaka reference discloses a method of manufacturing active matrix display backplanes.

REQUEST FOR ADMISSION NO. 118:

Admit that the Yudasaka reference discloses a method of manufacturing active matrix displays.

REQUEST FOR ADMISSION NO. 119:

Admit that the Yudasaka reference discloses an insulating substrate.

REQUEST FOR ADMISSION NO. 120:

Admit that the Yudasaka reference discloses forming a pattern of pixels on a substrate.

REQUEST FOR ADMISSION NO. 121:

Admit that the Yudasaka reference discloses forming a plurality of row pixel activation lines.

REQUEST FOR ADMISSION NO. 122:

Admit that the Yudasaka reference discloses forming a plurality of column pixel activation lines.

REQUEST FOR ADMISSION NO. 123:

Admit that the Yudasaka reference discloses forming a plurality of row and column intersecting pixel activation lines.

REQUEST FOR ADMISSION NO. 124:

Admit that the Yudasaka reference discloses forming an inner electrostatic discharge guard ring on a substrate.

REQUEST FOR ADMISSION NO. 125:

Admit that the Yudasaka reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines.

REQUEST FOR ADMISSION NO. 126:

Admit that the Yudasaka reference discloses shunt switching elements.

REQUEST FOR ADMISSION NO. 127:

Admit that the Yudasaka reference discloses MOS transistors.

REQUEST FOR ADMISSION NO. 128:

Admit that the MOS transistors disclosed in the Yudasaka reference are shunt switching elements.

REQUEST FOR ADMISSION NO. 129:

Admit that the Yudasaka reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via shunt switching elements.

REQUEST FOR ADMISSION NO. 130:

Admit that the Yudasaka reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via MOS transistors.

REQUEST FOR ADMISSION NO. 131:

Admit that the Yudasaka reference discloses providing protection from electrostatic discharges between a plurality of row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 132:

Admit that the Yudasaka reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via shunt switching elements to provide protection from electrostatic discharges between said row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 133:

Admit that the Yudasaka reference discloses forming an inner electrostatic discharge guard ring on a substrate coupled to a plurality of row and column intersecting pixel activation lines via MOS transistors to provide protection from electrostatic discharges between said row and column intersecting pixel activation lines during manufacture of active matrix displays.

REQUEST FOR ADMISSION NO. 134:

Admit that the Yudasaka reference discloses every step of the method of claim 10 of the '002 patent.

REQUEST FOR ADMISSION NO. 135:

Admit that the purpose of the outer electrostatic discharge guard ring disclosed in the Kawamura reference is to protect active matrix displays from electrostatic discharge damage.

REQUEST FOR ADMISSION NO. 136:

Admit that the purpose of the outer electrostatic discharge guard ring disclosed in the Okawa reference is to protect active matrix displays from electrostatic discharge damage.

REQUEST FOR ADMISSION NO. 137:

Admit that the purpose of the inner electrostatic discharge guard ring disclosed in the Oritsuke reference is to protect active matrix displays from electrostatic discharge damage.

REQUEST FOR ADMISSION NO. 138:

Admit that the purpose of the inner electrostatic discharge guard ring disclosed in the Yudasaka reference is to protect active matrix displays from electrostatic discharge damage.

REQUEST FOR ADMISSION NO. 139:

Admit that the use of inner electrostatic discharge guard rings in the manufacture of active matrix displays were known to those of ordinary skill in the art related to the '002 patent prior to July 12, 1987.

REQUEST FOR ADMISSION NO. 140:

Admit that outer electrostatic discharge guard rings in the manufacture of active matrix displays were known to those of ordinary skill in the art related to the '002 patent prior to July 12, 1988.

REQUEST FOR ADMISSION NO. 141:

Admit that the importance of protecting active matrix displays from electrostatic discharge damage during their manufacture was known to those of ordinary skill in the art related to the '002 patent prior to July 12, 1988.

REQUEST FOR ADMISSION NO. 142:

Admit that the importance of protecting active matrix displays from electrostatic discharge damage after their manufacture was known to those of ordinary skill in the art related to the '002 patent prior to July 12, 1988.

REQUEST FOR ADMISSION NO. 143:

Admit that the combination of an inner and outer electrostatic discharge guard ring in an active matrix displays does not produce any unexpected or surprising result to those of ordinary skill in the art related to the '002 patent prior to July 12, 1988.

REQUEST FOR ADMISSION NO. 144:

Admit that, when manufacturing an active matrix display with an outer electrostatic discharge guard ring, there is no additional variable expense involved by adding the inner ring to the manufacturing process.

REQUEST FOR ADMISSION NO. 145:

Admit that, when manufacturing an active matrix display with an outer electrostatic discharge guard ring, there is only *de minimis* additional variable expense involved by adding the inner ring to the manufacturing process.

REQUEST FOR ADMISSION NO. 146:

Admit that the same lithographic steps would be required to manufacture an active matrix display with both an inner and outer electrostatic discharge guard ring.

REQUEST FOR ADMISSION NO. 147:

Admit that the term "pickup pad" appearing in the '002 patent is not a term of art.

REQUEST FOR ADMISSION NO. 148:

Admit that one of ordinary skill in the art related to the '002 patent would only understand the meaning of the term "pickup pad" appearing in the '002 patent by reading the specification of the '002 patent.

REQUEST FOR ADMISSION NO. 149:

Admit that a transfer electrode was well known to one of ordinary skill in the art related to the '002 patent prior to July 12, 1988.

REQUEST FOR ADMISSION NO. 150:

Admit that manufacturers of active matrix LCD substrates have used a transfer electrode since 1983.

REQUEST FOR ADMISSION NO. 151:

Admit that active matrix LCD substrates have included a transfer electrode prior to July 12, 1988.

REQUEST FOR ADMISSION NO. 152:

Admit that the Sakai reference discloses a transfer electrode.

REQUEST FOR ADMISSION NO. 153:

Admit that the Sakai reference discloses a connection between the back plane and front plane of an active matrix LCD display.

REQUEST FOR ADMISSION NO. 154:

Admit that the Sakai reference discloses a connection between the back plane and front plane of an active matrix LCD display using a transfer electrode.

REQUEST FOR ADMISSION NO. 155:

Admit that the Sakai reference discloses forming transfer electrodes on a substrate.

REQUEST FOR ADMISSION NO. 156:

Admit that the Sakai reference discloses a connection between the back plane and front plane of an active matrix LCD display using a pickup pad.

REQUEST FOR ADMISSION NO. 157:

Admit that the Sakai reference discloses a pickup pad.

REQUEST FOR ADMISSION NO. 158:

Admit that the Sakai reference discloses forming pickup pads on a substrate.

REQUEST FOR ADMISSION NO. 159:

Admit that LPL uses alignment marks for front and back planes when assembling LCD panels.

REQUEST FOR ADMISSION NO. 160:

Admit that one of ordinary skill in the art related to the '002 patent was, prior to July 12, 1988, aware of the use of alignment marks for front and back planes when assembling LCD panels.

REQUEST FOR ADMISSION NO. 161:

Admit that the Sakai reference discloses the use of alignment marks for front and back planes when assembling LCD panels.

REQUEST FOR ADMISSION NO. 162:

Admit that the Sakai reference discloses the combination of pickup pads and alignment marks for front and back planes.

REQUEST FOR ADMISSION NO. 163:

Admit that the Sakai reference discloses the combination of transfer electrodes and alignment marks for front and back planes.

REQUEST FOR ADMISSION NO. 164:

Admit that the term "corner pad" appearing in the '002 patent is not a term of art.

REQUEST FOR ADMISSION NO. 165:

Admit that one of ordinary skill in the art related to the '002 patent would only understand the meaning of the term "corner pad" appearing in the '002 patent by reading the specification of the '002 patent.

REQUEST FOR ADMISSION NO. 166:

Admit that using a reference mark for cutting a substrate during the manufacture of an LCD display was well known to one of ordinary skill in the art related to the '002 patent prior to July 12, 1988.

REQUEST FOR ADMISSION NO. 167:

Admit that manufacturers of LCD substrates have used a reference mark for cutting a substrate during the manufacture of the LCD prior to July 12, 1988.

REQUEST FOR ADMISSION NO. 168:

Admit that the Yamada reference discloses a reference mark for cutting a substrate during the manufacture of an LCD display.

REQUEST FOR ADMISSION NO. 169:

Admit that the Yamada reference discloses a corner pad.

REQUEST FOR ADMISSION NO. 170:

Admit that the Sakai reference discloses L-shaped alignment marks located at the corners of the substrates an active matrix LCD display.

REQUEST FOR ADMISSION NO. 171:

Admit that the Sakai reference discloses a reference mark for cutting a substrate during the manufacture of an active matrix LCD display.

REQUEST FOR ADMISSION NO. 172:

Admit that the Sakai reference discloses a corner pad.

REQUEST FOR ADMISSION NO. 173:

Admit that the Kodaira reference discloses reference marks on the substrates an active matrix LCD display.

REQUEST FOR ADMISSION NO. 174:

Admit that the Kodaira reference discloses reference marks on a corner of a substrates an active matrix LCD display.

REQUEST FOR ADMISSION NO. 175:

Admit that the Kodaira reference discloses L-shaped reference marks on the substrates an active matrix LCD display.

REQUEST FOR ADMISSION NO. 176:

Admit that the Kodaira reference discloses a corner pad.

REQUEST FOR ADMISSION NO. 177:

Admit that the Sakai reference discloses forming corner pads on a substrate.

REQUEST FOR ADMISSION NO. 178:

Admit that the Yamada reference discloses forming corner pads on a substrate.

REQUEST FOR ADMISSION NO. 179:

Admit that the Kodaira reference discloses forming corner pads on a substrate.

REQUEST FOR ADMISSION NO. 180:

Admit that one of ordinary skill in the art related to the '002 patent was, prior to July 12, 1988, aware of the use of reference marks for cutting substrates of an LCD panel.

REQUEST FOR ADMISSION NO. 181:

Admit that one of ordinary skill in the art related to the '002 patent was, prior to July 12, 1988, aware of corner pads.

REQUEST FOR ADMISSION NO. 182:

Admit that the Kawamura reference was not considered by the U.S Patent Office Examiner during the prosecution of the '002 patent.

REQUEST FOR ADMISSION NO. 183:

Admit that the Okawa reference was not considered by the U.S Patent Office Examiner during the prosecution of the '002 patent.

REQUEST FOR ADMISSION NO. 184:

Admit that the Oritsuke reference was not considered by the U.S Patent Office Examiner during the prosecution of the '002 patent.

REQUEST FOR ADMISSION NO. 185:

Admit that the Yudasaka reference was not considered by the U.S Patent Office Examiner during the prosecution of the '002 patent.

REQUEST FOR ADMISSION NO. 186:

Admit that the Sakai reference was not considered by the U.S Patent Office Examiner during the prosecution of the '002 patent.

REQUEST FOR ADMISSION NO. 187:

Admit that the Yamada reference was not considered by the U.S Patent Office Examiner during the prosecution of the '002 patent.

REQUEST FOR ADMISSION NO. 188:

Admit that the Kodaira reference was not considered by the U.S Patent Office Examiner during the prosecution of the '002 patent.

REQUEST FOR ADMISSION NO. 189:

Admit that the Kawamura reference is not in the U.S Patent Office file history for the '002 patent.

REQUEST FOR ADMISSION NO. 190:

Admit that the Okawa reference is not in the U.S Patent Office file history for the '002 patent.

REQUEST FOR ADMISSION NO. 191:

Admit that the Oritsuke reference is not in the U.S Patent Office file history for the '002 patent.

REQUEST FOR ADMISSION NO. 192:

Admit that the Yudasaka reference is not in the U.S Patent Office file history for the '002 patent.

REQUEST FOR ADMISSION NO. 193:

Admit that the Sakai reference is not in the U.S Patent Office file history for the '002 patent.

REQUEST FOR ADMISSION NO. 194:

Admit that the Yamada reference is not in the U.S Patent Office file history for the '002 patent.

REQUEST FOR ADMISSION NO. 195:

Admit that the Kodaira reference is not in the U.S Patent Office file history for the '002 patent.

REQUEST FOR ADMISSION NO. 196:

The outer guard ring used during the manufacturing of Defendants' products alleged to infringe are not coupled to the interconnected row and column pixel activation lines by a resistance.

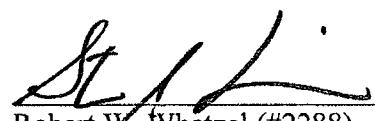
REQUEST FOR ADMISSION NO. 197:

The outer guard ring used during the manufacturing of Defendants' products alleged to infringe are connected to the interconnected row and column pixel activation lines by diodes.

OF COUNSEL:

Christine A. Dudzik
Thomas W. Jenkins
Howrey LLP
321 North Clark Street, Suite 3400
Chicago, Illinois 60610
(312) 595-1239

Teresa M. Corbin
Glenn W. Rhodes
Howrey LLP
525 Market Street, Suite 3600
San Francisco, CA 94105
(415) 848-4900



Robert W. Whetzel (#2288)
whetzel@rlf.com
Steven J. Fineman (#4025)
fineman@rlf.com
Matthew W. King (#4566)
king@rlf.com
Richards, Layton & Finger
One Rodney Square, P.O. Box 551
Wilmington, DE 19899
(302) 651-7700
Attorneys for Defendants/Counterclaimants
Tatung Company, Tatung Company of
America, Chunghwa Picture Tubes, Ltd, and
Viewsonic Corporation

Dated: June 16, 2006